



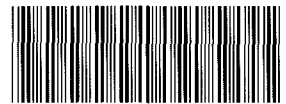
Rocky Flats Environmental Technology Site

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June 20, 1996

96-RM-TA-0130-KH

Randy M. Leitner, Program Manager
Compliance & Performance Assurance
Building T130C
Kaiser-Hill, L.L.C.
Rocky Flats Environmental Technology Site

**RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) CLOSURE PLAN FOR BUILDING 707
C-PIT TANK SYSTEM - GRK-174-96**

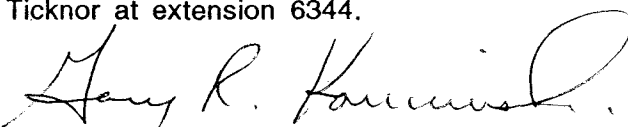
Action: Submit 707 C-Pit RCRA Closure Plan to DOE for Information Only

Rocky Mountain Remediation Services is submitting a RCRA closure plan for the Building 707 C-Pit Tank System (organic liquid waste collection system), which includes the following RCRA Units:

<u>RCRA Unit Number</u>	<u>Tank Numbers</u>	<u>Tank Type</u>
90.004 through 90.019	V1 through V8 and V12 through V19	Pencil tank
92.001	V100	Rashig-ring tank
92.002 and 92.003	V30 and V31	Annular tank

In addition to these tanks, two gloveboxes (C-120 and 206-837) and various ancillary equipment will undergo closure as part of this RCRA tank system.

This system is no longer needed and should undergo RCRA closure in accordance with the Colorado Hazardous Waste Regulations (CHWR). There is an ongoing concern about the possibility of hydrogen gas generation in this tank system which makes closure of this system prudent. To date, a significant contribution has been made by Safe Sites of Colorado's (SSOC) and RMRS in the technical research and development of this closure plan. However, closure of this system is currently on the unfunded activities list. It is SSOC's intention to perform RCRA closure on this system when funding is secured. Please transmit this closure plan to the Department of Energy, Rocky Flats Field Office with their understanding that this project is not yet funded. If you have any questions or require additional information, please contact Kirk Ticknor at extension 6344.



Gary R. Konwinski
Performance Assurance
Rocky Mountain Remediation Services, L.L.C.

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B707-A-000036

Randy M. Leitner
GRK-174-96
June 20, 1996
Page 2

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Attachments:
As Stated (2)
cc:

K. L. Lovorato	-	Kaiser-Hill
K. North	-	Kaiser-Hill
D. L. Gorman	-	SSOC
M. D. Klein	-	SSOC
W. M. Wierzbicki	-	SSOC
C. C. Jierree	-	RMRS
K. W. Ticknor	-	RMRS
RMRS Records Center	-	Building 080
File		

DRAFT

DRAFT

DRAFT

Steve Tower, Group Lead
Rocky Flats Field Office
U. S. Department of Energy

Attn: Dave Grosek

TRANSMITTAL OF THE BUILDING 707 C-PIT TANK SYSTEM CLOSURE PLAN

Kaiser-Hill is submitting, for your information only, a RCRA closure plan for the Building 707 C-Pit Tank System (organic liquid waste collection system), which includes the following RCRA Units:

<u>RCRA Unit Number</u>	<u>Tank Numbers</u>	<u>Tank Type</u>
90.004 through 90.019	V1 through V8 and V12 through V19	Pencil tank
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This system is no longer needed and should undergo RCRA closure in accordance with the Colorado Hazardous Waste Regulations (CHWR). There is an ongoing concern about the possibility of hydrogen gas generation in this tank system which makes closure of this system prudent. To date, a significant contribution has been made by Safe Sites of Colorado's (SSOC) and RMRS in the technical research and development of this closure plan. However, closure of this system is currently on the unfunded activities list. It is SSOC's intention to perform RCRA closure on this system when funding is secured. We will stay in contact with your staff to recommend the appropriate date for the Department of Energy to submit this plan to the Colorado Department of Public Health and Environment for approval.

If you have any questions or require additional information, please contact Randy Leitner at extension 3537, or Kirk Ticknor, RMRS, at extension 6344.

Randy Leitner, Program Manager
Compliance & Performance Assurance

Enclosure: (as stated)

cc w/ enclosure

D. Maxwell - DOE, RFFO
K. North - Kaiser-Hill
G. M. Kelly - Kaiser-Hill
D. L. Gorman - SSOC
M. D. Klein - SSOC
C. C. Jierree - RMRS

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RCRA Closure Plan Building 707 C-Pit (Partial System Closure)

EPA ID No. C07890010526



Exempt from Classification
per CEX-003-95 - RCRA only

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1.0 Introduction

1.1 Purpose

This closure plan identifies the tanks and equipment associated with Building 707 C-Pit tank system that are to undergo Resource Conservation and Recovery Act (RCRA) closure at the Rocky Flats Environmental Technology Site (RFETS). This process constitutes partial closure of the RFETS facility. This plan addresses RCRA closure of the following tanks that are part of the Building 707 C-Pit system:

<u>Tank Types</u>	<u>Number of Tanks</u>	<u>Tank Numbers</u>	<u>RCRA Unit Numbers</u>
Pencil Tanks	16	V1 - V8 and V12 - V19	RCRA Units 92.004 - 92.019
Annular tanks	2	V30 and V31	RCRA Units 92.002 and 92.003
Raschig-ring tank	1	Tank V100	RCRA Unit 92.001

In addition to the tanks described above, the following equipment is included in the closure of this system: two gloveboxes (C-120 and 206-837), coated concrete secondary containment, piping, pumps, raschig rings, filter housings, and miscellaneous fittings.

1.2 Regulatory Requirements

This closure plan is being submitted in accordance with Section 265.112(d)(1) of the Code of Colorado Regulations (6 CCR), which requires that facilities intending to close interim status units submit a plan detailing the closure activities at least 45 days prior to commencing closure. This plan addresses specific closure requirements contained in 6 CCR, Part 265, Subpart G - Closure and Post-closure, and Subpart J - Tanks.

Demonstration of financial responsibility is not required for government-owned facilities, pursuant to 6 CCR, Section 266.10(c).

1.3 Facility History

Rocky Flats Environmental Technology Site is owned and operated by the U.S. Department of Energy (DOE) and is co-operated by Kaiser-Hill, Inc. The original mission of the site was production of metal components for nuclear weapons. In support of this mission, Building 707 was the main facility for processing plutonium metal components.

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The Building 707 C-Pit Tank System was used as the organic liquid waste collection system for Building 707. Organic waste oils and solvents were generated from the production of weapons components in Building 707. These wastes were generated in gloveboxes and entered the C-Pit tank system's piping through gloveboxes drains. The waste was filtered through liquid cartridge filters prior to collection in the C-Pit tanks.

Currently, Building 707 is being used for plutonium oxide stabilization as well as special nuclear material and waste storage. Other ongoing activities in Building 707 are those necessary to maintain building safety envelopes and baseline activities. Routine surveillances and inspections are performed to ensure building compliance.

1.4 Facility Contact

The RFETS contact for closure activities is as follows:

Manager, Rocky Flats Field Office
U.S. Department of Energy
P.O. Box 928
Golden, Colorado 80402-0928
Phone: (303) 966-2025

2.0 Unit Description

The piping for the Building 707 C-Pit tank system resides on the first floor and extends through Modules A, B, C, D, E, F, G, J, and K. This piping leads to the tanks in the basement area known as the C-Pit. The transfer line from C-Pit to Building 774 enters Building 777 in Room 131. This is considered the end of the RCRA piping associated with C-Pit.

The C-Pit has a separate collection system for spent 1,1,1-trichloroethane solvent and for oil contaminated with solvents. A general discussion of the process that was performed in 707 C-Pit is as follows:

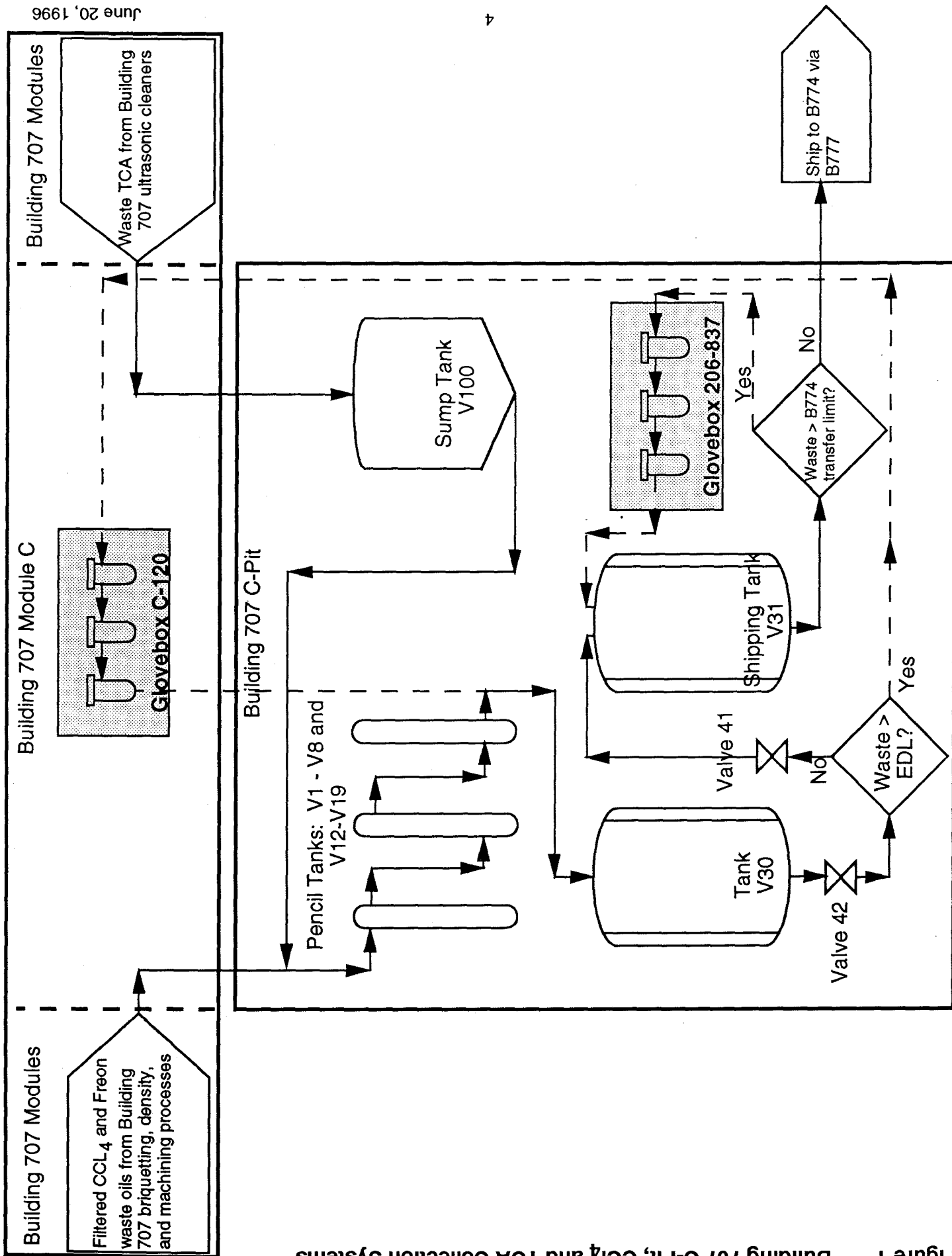
- The sixteen pencil tanks, located in the C-Pit were used to collect machine oil from the processing of plutonium metal parts. The machine oil, which was contaminated with carbon tetrachloride (CCL₄) and 1,1,2-trichloro-1,2,2-trifluoroethane, was filtered in Glovebox C-120 after leaving the pencil tanks. After filtration, the used machine oil was transferred to Tank V30 for sampling to determine if the actinide concentration in the liquid was below Economic Discard Limits (EDL).

- Spent 1,1,1-trichloroethane (TCA) solvent was collected in Tank V100 and transferred to Tank V30 for sampling. The machine oil and spent solvents were then sampled to determine if the liquid was below EDL. If the liquid was above the EDL, the liquid was transferred back to Glovebox C-120 to be refiltered. This process was repeated until an acceptable concentration was attained.
- Once an acceptable EDL concentration was attained, the liquid was then transferred to Tank V31 and sampled to determine if the fissile material transfer limit for Building 774 was exceeded. If the fissile material concentration exceeded the transfer limit, the organic waste was filtered by liquid cartridge filters in Glovebox 206-837 (located in the C-Pit) and resampled in Tank V31. This process was repeated until an acceptable fissile material transfer limit was attained. Once the liquid was verified to be below the EDL and fissile material transfer limits, the liquid was pumped from Tank V31 to Building 774 via Building 777.

The process flow diagram for Building 707 C-Pit is shown in Figure 1

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Figure 1 Building 707 C-Pit, CCL₄ and TCA Collection Systems



3.0 Waste Characterization

The carbon tetrachloride (CCL_4) collected in C-Pit was used to degrease metal parts, clean plutonium briquettes, and wash glovebox interiors. Machined parts were cleaned in ultrasonic cleaners and vapor degreasers filled with 1,1,1-trichloroethane (TCA) solvent. 1,1,2-trichloro-1,2,2-trifluoroethane (Freon) was used as a solvent and as a density bath fluid in separate processes. The spent carbon tetrachloride is a RCRA listed hazardous waste carrying the EPA waste code F001. TCA and Freon are RCRA listed hazardous wastes carrying the EPA waste code F002.

All of the waste generated during closure activities will be characterized and managed according to its characterization. If any portion of the C-Pit system does not meet the closure performance standards set forth in this plan, it will be managed as mixed waste or mixed debris. Some of the equipment will be aggressively decontaminated in an attempt to minimize the amount of transuranic mixed waste that will be generated.

3.1 Historical Releases to Secondary Containment

Releases from the C-Pit tank system to secondary containment occurred in the C-Pit and Module C during production operations. Waste was released into Gloveboxes C-120 and 206-837 as well as onto the floor of the C-Pit and Module C. Information on releases of organic waste to secondary containment was compiled from the Rocky Flats Plant Historical Release Report of 1992 and interviews with Building 707 personnel.

All the residual from spills to the C-Pit floor have been removed and cleaned. Also, the floor was repainted to seal in existing radiological contamination. Therefore, the floors and subsurfaces beneath the C-Pit Tank System will not be addressed during this partial closure but instead will be addressed when Building 707 undergoes decommissioning.

4.0 Closure Performance Standard

The closure performance standard specifies that hazardous waste facilities are to be closed in a manner that minimizes the need for further maintenance at the facility and protects human health and the environment by controlling, minimizing, or eliminating potential releases of hazardous waste to the environment (6 CCR, Section 265.111). Specific closure performance standards for each of the components of this system are defined in the following subsections.

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4.1 Closure Performance Standard for Pencil Tanks and Ancillary Equipment

Pencil tanks and their ancillary equipment will be stripped out and managed as hazardous debris. The debris will be washed with an appropriate solution for decontamination of oil and solvents. Guidelines for appropriate decontamination solutions can be found in the tables located in the decontamination section of the Rocky Flats Part B Permit.

The closure performance standard proposed for this portion of the C-Pit system is to clean the surfaces that contacted RCRA-listed hazardous wastes to a clean debris standard using approved debris rule treatment alternatives and extraction technologies as defined in 6 CCR, Part 268.45. The debris standard is defined in footnote 3 to Table 1 in 6 CCR, Part 268.45 as follows:

"The surface, when viewed without magnification, shall be free of all visible contaminated soil and hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discolorations, and soil and waste in cracks, crevices, and pits may be present provided that such staining and waste and soil in cracks, crevices, and pits shall be limited to no more than 5 percent of each square inch of surface area."

Debris that is treated by an extraction or destruction technology as specified in 6 CCR, Part 268.45 that does not exhibit the characteristic of a hazardous waste, will be managed as nonhazardous debris in accordance with 6 CCR, Part 268.45(c).

- After decontamination, the tanks and equipment will be inspected using a remote camera or by direct visual inspection to evaluate if the tanks and equipment have achieved the clean debris standard. If the visual inspection or cleaning becomes technically infeasible or unsafe due to radiological concerns, the resulting waste will be managed as RCRA-regulated mixed waste. Upon meeting the closure performance standards, all above-grade portions of the pencil tanks and ancillary equipment will be packaged and managed in accordance with applicable waste regulations. This approach to achieving a clean debris standard was
- chosen in an attempt to minimize mixed waste generation during closure activities.

This proposed closure performance standard is considered protective of human health and the environment since the waste is destined for off-site disposal at a radioactive or mixed waste disposal facility; consequently, post-decontamination sampling of the pencil tanks and ancillary equipment will not be performed.

4.2 Closure Performance Standard for Tank V100, Annular Tanks, and Inaccessible Piping

Tank V-100, the annular tanks, and inaccessible piping will be clean-closed and left in place. Tank cleaning will be performed by circulation of an appropriate solution for decontamination of oil and solvents. Guidelines for appropriate contamination solutions can be found in the tables located in the decontamination section of the Rocky Flats Part B Permit.

This equipment (tanks and inaccessible piping) will be flushed, rinsed, and sampled. To evaluate if the closure performance standard has been met, a representative rinsate sample will be collected from the equipment. Project engineers and sampling personnel will identify sampling frequency and location prior to initiating closure of the system. If the sampling results indicate that the used rinsate meets the closure performance standard, the equipment will be secured and considered RCRA clean-closed. The closure performance standards for used rinsate are as follows. Spent rinsate shall have non-detectable levels of the following organic constituents:

- Carbon Tetrachloride
- 1,1,1-Trichloroethane
- 1,1,2-Trichloro-1,2,2-Trifluoroethane

The advantage of washing and rinsing is that these portions of the C-Pit system (including tanks, rashig rings, inaccessible piping, and ancillary equipment) can be determined to be nonhazardous waste based on the analytical results of the spent rinsate. This would allow this portion of the system to be considered clean-closed in place. Deferral of strip-out of the tanks and ancillary equipment will allow the large tanks and piping contained in the floor to be removed during Building 707 decommissioning. This will minimize the amount of mixed waste generated during closure activities.

If the cleaning becomes technically infeasible or unsafe due to radiological concerns, accessible portions of the system will be stripped out, a waste characterization will be made, and the resulting waste will be characterized and managed appropriately. Inaccessible portions of the piping beneath the floor will be stripped out when the floor is removed during building decommissioning.

4.3 Closure Performance Standard for Gloveboxes

Because EPA listed wastes were stored and used in the gloveboxes, verification of the absence of carbon tetrachloride, 1,1,1-trichloroethane, and 1,1,2-trichloro-1,2,2-trifluoroethane will be performed to demonstrate compliance with the closure performance standards.

The proposed closure performance standard for Gloveboxes C-120 and 206-837 is to achieve a clean, dry glovebox surface and sample for the identified volatile organic compounds in the spent glovebox rinsing solution or by utilizing wipe sampling. These gloveboxes will be cleaned using appropriate cleansers and cleaning methods as defined in the decontamination section of the RCRA Part B Permit to obtain a clean dry surface. The closure performance standard for the gloveboxes requires non-detectable levels of the following organic constituents:

- Carbon Tetrachloride
- 1,1,1-Trichloroethane
- 1,1,2-Trichloro-1,2,2-Trifluoroethane

If the gloveboxes do not meet the closure performance standard, they will be stripped out, characterized, and managed appropriately.

5.0 Closure Activities

The following sections provide specific information concerning the closure activities that will govern the RCRA closure of the 707 C-Pit tank system. If, at any time, closure of these systems becomes technically impractical or unsafe, any portion or all of the 707 C-Pit tank system may be stripped out, characterized, and managed appropriately. Closure activities will be performed in accordance with RFETS work requirements.

5.1 Health and Safety

Due to the risk associated with the closure of this tank system, a safety evaluation will be performed prior to initiating closure. Also, a Criticality Safety Operating Limit (CSOL) has been prepared to ensure that all necessary radiological controls have been established and are being followed for this closure activity.

5.2 Preparation of Engineering Packages and Work Packages

System-specific engineering and work packages governing the closure activities will be prepared prior to initiating closure of this system. Engineering designs will be developed for the removal and decommissioning activities necessary for closure of the affected RCRA units. The engineering package will detail the sequence of activities and methods used to achieve closure of this system. A work package will also be prepared to direct and control closure activities.

The work package will address issues such as health and safety requirements, preparation of radiological containment systems, personal protective equipment (PPE) needs, and

waste packaging requirements. Additionally, the work package will contain a Job Safety Analysis that addresses all health and safety issues. The completed work/engineering packages will be filed at the Site during closure activities and for a minimum of 3 years after closure is achieved.

5.3 System Closure Activities

Ultrasonic testing of all accessible ancillary equipment has been performed to evaluate the location of any remaining liquids. The remaining liquid identified within the piping associated with C-Pit will be removed using hot taps, which are self-contained units. After securing the hot tap assay to the piping, a drill bit will be used to breach the pipe wall. Fluid flow will be controlled using a ball valve mounted on the hot tap body. The hot tap will be used to safely transfer the pipe contents to 4-liter bottles. Verification of the ultrasonic testing will be performed prior to pipe draining activities.

5.3.1 Closure of Pencil Tanks and Above-Ground Ancillary Equipment

Pencil tanks and their ancillary equipment will be removed in order to undergo cleaning and evaluation against the clean debris standards previously established. The method of tank removal will typically be performed using temporary containment structures. The tanks and ancillary equipment will be transferred into a containment structure with an attached air mover, which ensures airflow movement away from personnel. Once into the containment structure, the system component will be cut into segments for cleaning and evaluation against the closure performance standards. These segments will be cleaned with an approved cleaning agent using wipes and swabs. The washing process which will utilize wipes will be followed by a clean water rinse applied to each segment with wipes. All liquids will be absorbed using wipes to avoid generation of liquid wastes. After cleaning, the surface of each component will be visually inspected to evaluate if the closure standard has been met. If a clean surface has not been achieved, the process will be repeated. If a clean surface cannot be achieved with additional cleaning, that affected segment will be managed as hazardous debris.

Accessible ancillary equipment will be cleaned using the same technique as described in Section 4.1. This ancillary equipment is located in the C-Pit and Building 707 Modules A, B, C, D, E, F, G, J, and K. Piping, pumps, and filters that can be visually inspected will be closed in conjunction with the pencil tanks. Ancillary equipment within gloveboxes will be removed from the gloveboxes through glovebox bag ports. The ancillary equipment will be size reduced as necessary for packaging. If a clean surface cannot be achieved, the equipment will be managed as hazardous debris.

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5.3.2 Closure of Tank V100 and the Annular Tanks (V30 and V31)

Tank V100, the two annular tanks, and the associated piping will be cleaned by recirculating an appropriate decontamination solution through the system. After Tank V100 has been washed and rinsed, spent rinsate samples will be analyzed and evaluated against the closure performance standard. Additional washing and rinsing may be performed if necessary. If the closure standard is not met, the raschig rings will be removed and disposed of as hazardous debris and the tanks will undergo further cleaning. Because of their large size, Tanks V100, V30, and V31 will be clean-closed in place and removed during building decommissioning.

Ancillary equipment may be cleaned during the Tank V100 recirculation or by wiping (if accessible). Piping, pumps, and filters will be removed as part of the closure activities. The method of removal will typically be performed using containment structures. The piping may be size-reduced after removal. Ancillary equipment within gloveboxes will be removed through glovebox bag ports. The ancillary equipment will be size-reduced as necessary for waste packaging. The raschig rings from Tank V100 will be contained in plastic and packaged for waste disposal. The advantage of this strategy is that clean-closure of the tanks and raschig rings may be achieved as a single closure event. If successful, the amount of solid mixed-waste generated during closure will be significantly minimized.

5.3.3 Closure of the Transfer Piping

The C-Pit system transfer piping is interconnected with the Building 777 organic waste transfer system. The piping from the 707 C-Pit system will be physically isolated from the Building 777 organic transfer system in Room 131 since this is the end of the RCRA piping associated with this closure. An approved decontamination solution will be circulated through the piping or directly applied to accessible portions of the system components using wipes, swabs, or abrasive pads. The used decontamination solution will be pre-treated to remove organics prior to transfer to the Building 374 wastewater treatment facility. If the visual inspection or cleaning becomes technically infeasible or unsafe due to radiological concern, the piping will be stripped out and managed as hazardous debris.

5.3.4 Closure of Gloveboxes

Surfaces will be cleaned by applying an approved cleaning solution to an absorbent wipe or swab and then wiping the surface until clean. Samples from spent rinsing solution or wipe samples will be analyzed against the closure performance standard. This method will not generate liquid wastes. If either of the gloveboxes do not meet the closure performance standard, the gloveboxes will be managed as mixed waste.

5.3.5 Closure of Ancillary Equipment within the Floor

Piping associated with the C-Pit is located within the concrete floor between the main level of the building and the C-Pit. This piping is chased (lined) with a larger diameter pipe that serves as its secondary containment. The piping and pipe chase cannot be removed without removing portions of the floor. Removal of floor would result in the generation of low-level radioactive concrete waste, and would require replacement of the floor. Thus, this piping will be rinsed and secured, and evaluated against the clean-closure performance standard during the cleaning and sampling of Tanks V100, V30, and V31. If the clean-closure performance standard is not met, this piping will be stripped out during decommissioning of the building.

5.4 Characterization and Disposition of Wastes Generated During Closure

Waste expected to be generated during closure consists of metal, glass (raschig-rings), and combustibles. In addition, liquids or sludges encountered during closure will be characterized and managed in accordance with applicable waste regulations. Characterization and disposition of each of these waste types are discussed in this section.

All wastes will be packaged to meet appropriate waste packaging regulations. The mixed waste will be stored in permitted RCRA hazardous waste storage units pending final treatment or disposal. Metal and raschig-rings that are characterized as mixed waste will be assigned EPA hazardous waste codes F001 and F002. Raschig rings will be considered nonhazardous waste if the rinsate samples from Tank V100 meet clean-closure performance standards. Gloveboxes C-120 and 206-837 will undergo size reduction in Building 707 or Building 776 after cleaning.

Combustible wastes will also be packaged to meet appropriate waste regulations. Wipes used to clean the liquids or sludges from C-Pit components will typically be managed as low-level mixed waste. The mixed waste will be stored in permitted RCRA hazardous waste storage units pending final treatment or offsite disposal. Combustible wastes that did not come into direct contact with the hazardous constituents within the C-Pit system such as PPE and contamination control plastic will be managed as low-level radioactive waste.

Any liquids or sludges encountered (except for very small amounts that may be wiped away) will be handled in accordance with the Criticality Safety Operating Limit developed for the closure activities. The liquid or sludge will be managed as mixed waste and stored appropriately pending final treatment or offside disposal.

6.0 Waste Generation Rates

The following are estimated waste volumes for liquid and solid wastes that will be generated during the RCRA closure of the Building 707 C-Pit. All wastes will be considered mixed waste unless field or lab analysis indicates differently. Minimum and maximum volumes were estimated for physically solid waste. Size reduction could reduce the volume of waste generated.

6.1 Estimated Liquid Waste Volume

The estimated amount of liquid waste to be generated from the wash and rinse of Tank V100 and the C-Pit system piping is based on the physical dimensions of the system components. If one wash and rinse cycle does not meet the closure standards, additional wash and rinse cycles will be performed.

The amount of liquid waste estimated to be generated from this closure activity is as follows:

- The minimum volume of liquid expected to be generated based on one wash and one rinse of the system is 8,786 gallons.
- The maximum amount of liquid expected to be generated, based on a triple wash, rinse, and sample is 26,358 gallons.

6.2 Estimated Solid Waste Volumes

Equipment (except for PPE) that has been used to directly process, handle, or store transuranic material which came into direct contact with the solvents is assumed to be mixed waste; however, it is expected that, after decontamination, much of this waste will be characterized as low-level nonhazardous waste or nonhazardous debris.

The solid waste volumes include the tanks, ancillary equipment, and gloveboxes as described in previous sections. The estimated volumes are shown in Table 1.

Table 1 Estimated Solid Mixed Waste Generations

Type of Waste	Minimum Volume (cubic feet)	Maximum Volume (cubic feet)
Tanks	140	720
Ancillary Equipment	290	490
Gloveboxes	130	1070
Total (cubic feet)	560	2,280

7.0 Certification of Closure

Within 60 days after completion of closure, the site will submit to the Colorado Department of Public Health and Environment certification that the tanks, piping, ancillary equipment, and secondary containment have been closed in accordance with the approved closure plan. The certification will be signed by the owner, or operator, or co-operator of the facility and by an independent, Colorado-registered professional engineer.

7.1 Criteria for Determining Post-Closure Care

The soils and ground water under Building 707, as well as the floors in Building 707, are suspected of being contaminated. Building 707 is listed as a Potential Area of Concern in the Rocky Flats Plant Historical Release Report of 1992.

The mechanism for addressing PACs was specified in the Environmental Restoration Interagency Agreement (IAG). A new cleanup agreement is currently being negotiated that will address these post closure care requirements. Therefore, soils and the floors of Building 707 will not be addressed as part of this RCRA partial closure plan.

8.0 Recordkeeping

The site shall maintain the following closure records at the facility during closure activities and for a minimum of 3 years following closure certification:

- Record of sampling activities (date, number, and type)
- Analytical results
- Records of actions taken to decontaminate equipment or structures
- Work control packages governing the closure of this RCRA system
- Other documentation which verifies that the Site followed the approved closure plan

9.0 Amendment of Closure Plan

In conducting closure, unexpected events that occur during the implementation of required closure activities may require an amendment of the existing closure plan. Any request for the modification of the closure plan will be made within 30 days of identification of the event that causes modification to be necessary.

10.0 Closure Schedule

The schedule for this closure of the C-Pit is expected to extend two years from the time the closure plan is approved and funding is allocated. Safe Sites of Colorado will request funding from DOE, Rocky Flats Field Office to accomplish closure of the Building 707 C-Pit Tank System.

It is expected that because of the magnitude of this project, the special health and safety concerns associated with working with transuranic waste, and the extensive amount of piping involved, it may take up to two years to complete the closure activities outlined in this plan.

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